

1 The originally permitted concept provided for an Operation and Maintenance Facility
2 with a building footprint of 5,000 square feet and a total footprint of two acres. It was
3 to be located at the high point of the first ridge close to tower #C2. PSE desires to
4 change this concept to utilize the permitted area as an Operations Center, which will
5 include visitor accommodations, and to locate a larger Maintenance Center close the
6 Vantage Highway as shown in Exhibit A, attached hereto. The new Maintenance
7 Center would have a building footprint of approximately 12,000 square feet. The
8 entire facility would be approximately five acres in size and would integrate the
9 Informational Kiosk and Visitor Parking, for which two acres was allotted in the
10 approved plan (the graveled area currently being used for construction trailers and
11 vehicle parking).

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13 PSE's recent experience with construction of a similar project (our Hopkins Ridge
14 project in Columbia County) is that the permitted facility is adequate for day to day
15 operations but does not provide enough shop space or spare parts storage for the
16 larger and heavier turbine components. Since both Hopkins Ridge and Wild Horse
17 utilize identical turbine components, PSE wishes to provide expanded facilities at
18 Wild Horse that can service both projects. In addition, because of the proximity to
19 major metropolitan areas and the visibility of the Wild Horse site from I-90 it is
20 expected that the facility will receive more visitors than the Hopkins Ridge facility.

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22 The advantages of the proposed change are:

- 23
- Increased workshop and storage space.
 - Location near Vantage Highway provides better all weather access. Staff can
24 park private vehicles at Maintenance Facility and use site based ATVs, or 4-wheel
25 drive vehicles to traverse site gravel roads. Equipment such as a snowplow can
26 be housed at Maintenance Center and be accessible when needed, whereas at the
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1 Operation Center the access road may be impassable due to snow drifts at certain
2 times.

- 3 • Parking private vehicles near the project entrance reduces the number of journeys
4 along gravel roads and minimizes the potential extent of fugitive dust and
5 gravel/mud tracked onto the public highway.
- 6 • The area near Vantage Highway has been degraded by years of public use,
7 represents minimum impact on habitat. This area was within the original study
8 area for the project and does not contain any sensitive features, such as
9 archeological finds or rare plants.
- 10 • By integrating the Informational Kiosk and Visitor Parking, some functions such
11 as blade truck turnaround and parking can overlap between the two areas thus
12 minimizing the space requirements.
- 13 • PSE can design and site the Operations Center structure in a less obtrusive way to
14 minimize the visual impact on the ridgeline. This structure will enjoy spectacular
15 views in multiple directions, a feature which PSE is anxious to preserve (refer
16 Transmission Line Re-alignment).
- 17 • A location close to Vantage Highway is advantageous for normal operations,
18 deliveries of consumables, replacement parts, packages, etc., and other functions
19 requiring public access.
- 20 • The presence of a PSE Maintenance Facility adjacent to the Information Kiosk
21 provides a degree of increased public security for that location during business
22 hours.

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24 The change does not substantially alter the substance of the SCA or result in
25 significant detrimental effects on the environment. It changes the location of the
26 maintenance facility and better optimizes and controls the visitor use of the site. The
27 disturbed area and building footprint which will be utilized by the Operations Center

1 will remain the same as that allotted for Operation and Maintenance Facility in the
2 SCA. The Maintenance Center will require a net of three additional three acres of
3 permanently disturbed area. As stated above this area does not contain any sensitive
4 features and will have minimal impact on habitat. It should be noted that 600 acres of
5 the site was set aside as a mitigation parcel for the environmental impacts of the
6 project. The size of the mitigation parcel was far in excess of the impacts of the
7 project. increase of permanent impact caused by this amendment has been fully
8 mitigated by the size of the mitigation parcel

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10 b. Transmission Feeder Line Re-alignment

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12 A partial re-alignment of the project's 230kV Transmission Feeder Line, as shown in
13 Exhibit A, is also proposed. PSE desires to move the transmission line several
14 hundred feet away from the Operations Center, so it will not block skyline of views
15 from the facility. As originally permitted, the line passed very close to the Operations
16 Center. The concern was it would be directly in the field of view of some of the more
17 spectacular visual panoramas available from this ridge, including views of Mount
18 Rainier and Mount Hood.

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20 The proposed re-alignment has a 1,000 foot overall shorter total length thus reducing
21 impact on the environment. For areas away from the Operations Center, the feeder
22 line will follow the previously studied and permitted alignment.

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24 The portion of the alignment not previously surveyed was surveyed recently for
25 habitat types and historic and cultural resources. No historic or cultural resources
26 were found within the corridor. The habitats within the two corridors are comparable,
27 although their distributions are slightly different. The proposed realignment would

1 traverse approximately 86 percent medium density shrub-steppe, 9 percent
2 herbaceous, and 5 percent dense shrub-steppe compared to the original route which
3 would traverse approximately 88 percent medium density shrub-steppe and 12
4 percent herbaceous habitat. The major difference in the two routes is the shift of the
5 northern and central portions of the segment from a ridgetop and south-facing ridge
6 (in the original route) to a side slope above a drainage area (in the realigned route).
7 This shift is expected to result in a slight reduction in area of disturbance of the
8 herbaceous habitat type. This habitat typically includes lithosols, is commonly found
9 on ridges, and is known to be populated by hedgehog cactus in this locale.

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11 The realigned route would be located on the same types of habitat as the original
12 route and would affect less area. The realigned route is expected to result in a slight
13 reduction in the area of impact on herbaceous habitat which includes lithosols. Based
14 on results of the 2003 rare plant surveys and current field review, the only state-
15 designated rare plant known to occur in the project area and realigned transmission
16 line corridor is the hedgehog cactus, a review status species. Effects to this species
17 are expected to be slightly reduced from the original proposed transmission line route,
18 due to reduced effects on lithosols. The realignment was adjusted in the field to avoid
19 additional areas of well-developed lithosols. No other rare plant species were
20 observed in the project area during the 2003 surveys, and the realigned route is
21 located primarily within areas previously surveyed. No effects to any federally listed
22 threatened, endangered, candidate or proposed species would occur as a result of this
23 realignment, as none is known or suspected to occur in the project area or on the
24 habitats within the realignment corridor.

25 26 27 II. Requested Council Action

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2 PSE requests that the Council find that pursuant to WAC 463-66-040, the proposed
3 amendment is consistent with: 1) the intention of the original SCA; 2) the applicable
4 laws and rules; and 3) the public health, safety and welfare.

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6 Further PSE requests the Council to find pursuant to WAC 463- 66-070, that the
7 request is does not substantially alter the substance of any provision of the SCA and
8 does not have a significant detrimental effect on the environment.

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12 Dated this day of December, 2005
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18 Darrel L. Peeples, WSB #885
Attorney for PSE
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